

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KEWAZINGA CORP.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No.1:20-cv-01106-LGS

**DECLARATION OF EMILY H. CHEN IN SUPPORT OF  
DEFENDANT GOOGLE LLC'S RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Emily H. Chen, do hereby declare as follows:

1. I am an attorney duly licensed to practice law in the state of California and admitted *pro hac vice* to practice before this Court. I am an associate with the law firm of Desmarais LLP, attorneys for Defendant Google LLC ("Google") in the above-captioned case.

2. I submit this declaration in support of Google's Responsive Claim Construction Brief.

3. The matters set forth herein are within my personal knowledge and if sworn as a witness I could competently testify regarding them.

4. Attached hereto as **Exhibit A** is a true and correct copy of a document bearing Bates No. GOOG-KZGA-00000021 that was previously produced publicly at Dkt. 73-1 at 12.


5. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of the Declaration of Robert L. Stevenson in Support of Microsoft's Claim Construction Brief from *Kewazinga Corp. v. Microsoft Corp.*, found in its entirety at Case No. 1:18-cv-04500, Dkt. No. 46-9.

6. Attached hereto as **Exhibit C** is a true and correct copy of the Declaration of Keith Hanna, D.Phil. in Support of Kewazinga's Opening Claim Construction brief from *Kewazinga Corp. v. Microsoft Corp.*, found in its entirety at Case No. 1:18-cv-04500, Dkt. No. 43.

7. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the deposition of Jeffrey Lubin taken by Google on November 16, 2020, annotated with highlights referencing portions cited in Google's Responsive Claim Construction Brief.

8. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from the deposition of Robert L. Stevenson taken by Kewazinga on March 12, 2019 from *Kewazinga Corp. v. Microsoft Corporation*, found in its entirety at Case No. 1:18-cv-04500, Dkt. No. 52-1, annotated with highlights referencing portions cited in Google's Responsive Claim Construction Brief.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that I executed this declaration on January 22, 2021, in Houston, TX.

By:  \_\_\_\_\_  
Emily H. Chen